

EXHIBIT 1

REQUESTS STILL IN DISPUTE IN CONNECTION WITH TRUSTEE'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANT STANLEY SHAPIRO

Notes

- Those Requests which the Trustee has narrowed have been red-lined below.
- Those Requests to which there is no dispute between the parties are omitted from below.
- Those Requests which the Trustee is holding in abeyance are also omitted from below.
- Those Requests the Trustee maintains as originally drafted are repeated below.

Related Documents

5. All documents concerning the circumstances under which Mr. Shapiro~~You or any Family Member~~ began or continued to invest with BLMIS, including but not limited to documents concerning ~~Your or any Family Member's~~his decision to invest~~or to remain invested~~ with BLMIS.

6. All documents and communications between You and any Family Member concerning BLMIS or any of 1SH014, 1SH028, 1SH030, 1SH079, and 1SH172 (the "BLMIS Accounts~~Core Accounts~~").

7. All documents and communications between Mr. Shapiro~~You or any Family Member~~, on the one hand, and either Madoff, Annette Bongiorno or any other BLMIS employee, on the other hand, regarding any of the BLMIS Accounts, including but not limited to notes, faxes, letters, calendar entries, emails or telephone records.

8. All notes, whether made by Mr. Shapiro~~You, any Family Member~~, Madoff, Annette Bongiorno or any other employee of BLMIS, concerning any of the BLMIS Accounts~~Core Accounts~~.

9. All documents concerning any purported investment strategy of either BLMIS or Madoff or financial advice provided by either BLMIS or Madoff to Mr. Shapiro~~You or any Family Member.~~

11. All documents or communications between You and any other BLMIS investors, regardless of whether such individuals were BLMIS investors at the time of the communication (including but not limited to Ed Kostin, Carl Shapiro, and/or any investors You referred to BLMIS), concerning BLMIS.

14. All documents concerning any backdated or cancelled trade or any request to backdate or cancel any trade in any of the BLMIS Accounts, including but not limited to any account statement reflecting any backdated trade and/or any substitute or replacement account statement provided by BLMIS and/or Madoff to You, any Family Member, or any Accountant.

15. All documents concerning the destruction, the return to BLMIS or other disposition of any documents concerning any of the BLMIS Accounts, including but not limited to any account statements.

Trust-Related Documents and Gifts

19. All documents and communications concerning the formation of the LAD Trust, the Adam Shapiro 1985 Trust, the Leslie Shapiro 1985 Trust or the David Shapiro 1989 Trust;~~the Trust f/b/o David Shapiro's Children or the Trust f/b/o Leslie Shapiro Citron's Children.~~

20. All documents and communications concerning amending or restating the LAD Trust, the Adam Shapiro 1985 Trust, the Leslie Shapiro 1985 Trust or the David Shapiro 1989 Trust;~~the Trust f/b/o David Shapiro's Children or the Trust f/b/o Leslie Shapiro Citron's Children.~~

Accounting-Related and Tax-Related Documents

25. All documents provided to Mr. Shapiro ~~You or any Family Member~~ by any Accountant engaged ~~by You or any Family Member~~ to perform any type of services concerning any of the Core Accounts ~~BLMIS Accounts, including but not limited to schedules of realized or unrealized gains and losses or any other type of analysis.~~

26. All documents Mr. Shapiro ~~You or any Family Member~~ provided to any Accountant engaged ~~by You or any Family Member~~ to perform accounting services concerning any of the Core Accounts ~~BLMIS Accounts.~~

29. All communications between or among Mr. Shapiro ~~You, any Family Member,~~ Paul Konigsberg, any other Accountant, any employee of BLMIS and/or Madoff concerning any tax issue or other matter relating to any of the BLMIS Accounts, including but not limited to the realization or generation of gains or losses in connection with any of the ~~BLMIS Accounts~~ Core Accounts.

Due Diligence

31. All documents and communications concerning any of Mr. Shapiro's due diligence, ~~if any, whether performed or not, pertaining to any of Your or any Family Member's investments and/or investment decisions, including but not limited to such documents~~ concerning BLMIS and/or Madoff, Your decision whether or not to perform any due diligence on BLMIS, ~~and/or Madoff, or any of the Core Accounts and/or Your decision whether or not to have any due diligence performed on Your behalf or on behalf of any Family Member with regard to any investment, including but not limited to the BLMIS Accounts.~~

32. All documents and communications concerning whether BLMIS's operations were suspicious, unethical, fraudulent or a Ponzi scheme or whether You and/or the

Accountants suspected or knew that BLMIS and/or Madoff were engaged in improper, unusual, illegal, fraudulent, unethical or any other questionable activity.

33. All documents and communications concerning the purported returns for any of the Core Accounts. ~~on the BLMIS Accounts, including but not limited to the feasibility and consistency of returns or volatility of returns or any requests or attempts by You to adjust such returns.~~

Transfers and Subsequent Transfers

38. All documents concerning any actual, proposed, or contemplated requests for redemption or withdrawal ~~by You or any Family Member or made on Your behalf or on behalf of any Family Member~~ from any of the Core Accounts ~~BLMIS Accounts, and the means and terms of payment.~~

Income, Assets, and Investments

43. All documents concerning Mr. Shapiro's ~~Your~~ review, control, ~~and/or~~ management or any other type of activity for the Core Accounts ~~of the BLMIS Accounts or any of Your or any Family Member's other investments, including but not limited to realized or unrealized gain and loss calculations, rate of return analyses, margin balance calculations, and any inconsistencies or irregularities regarding such investments.~~